



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

NIKI SLATTERY  
*Senior Counsel*  
Phone: (212) 356-3520  
Fax: (212) 356-3159  
nbarguei@law.nyc.gov

March 29, 2024

**BY ECF**

Honorable Jennifer L. Rochon  
United States District Judge  
United States Southern District Court  
500 Pearl Street  
New York, NY 10007

Re: *Ross v City of New York, et al.*,  
23-CV-4927 (JLR)

Your Honor:

I am a Senior Counsel in the Office of Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney representing defendant City of New York (“City”) in the above-referenced matter. I write to respectfully request a brief two week adjournment of the Initial Conference, currently scheduled for April 11, 2024 at 11:00 a.m., until April 25, 2024, and a corresponding adjournment of the joint letter that is due April 1, 2024 pursuant to Your Honor’s February 23, 2023 “Notice of Initial Pretrial Conference.” This is the first request for an adjournment of the Initial Conference and will not affect any other scheduled deadlines. Plaintiff’s counsel consents to this request.

I make this request because I was just assigned the matter today and need sufficient time to familiarize myself with the case and to review the documents and work that has been done thus far. Additionally, I currently do not have sufficient information to have an informed position with regard to a discovery schedule at this juncture.

Accordingly, I respectfully request a brief two week adjournment of the April 11, 2024 Initial Conference until April 25, 2024 or until a date and time convenient to the Court and an extension of time to file the joint letter for the Initial Conference consummate with a newly appointed date.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/ Niki Slattery

Niki Slattery

*Senior Counsel*

cc: **VIA ECF**  
All Attorneys of Record

In light of the circumstances described, the Court **GRANTS** the request for the adjournment. The initial pretrial conference previously set for April 11, 2024 is adjourned to **May 9, 2024 at 10:30 a.m.** The corresponding deadline to file the joint letter is adjourned to **April 29, 2024.**

Dated: April 1, 2024  
New York, New York

**SO ORDERED.**

*Jennifer Rochon*  
**JENNIFER L. ROCHON**  
**United States District Judge**